

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

FILED-WD

802 JAN 25 PM 3:44
U. S. DISTRICT COURT

MARJORIE BLOOD,

Plaintiff,

vs.

MTP, INCORPORATED, d/b/a PAPA JOHN'S
PIZZA; PAPA JOHN'S INTERNATIONAL, INC.;
and KEVIN CAMPBELL

Defendants.

02C50029

Case No. _____

JURY DEMAND

COMPLAINT

Plaintiff, MARJORIE BLOOD, by her Attorneys, Reno, Zahm, Folgate, Lindberg & Powell, complains of the Defendants, MTP, INCORPORATED, d/b/a PAPA JOHN'S PIZZA; PAPA JOHN'S INTERNATIONAL, INC.; and KEVIN CAMPBELL as follows:

FACTS COMMON TO ALL COUNTS

1. At all material times hereto, Plaintiff, MARJORIE BLOOD, was an adult female resident of the County of Rock, State of Wisconsin.
2. At all material times hereto, Defendant, MTP, INCORPORATED ("MTP") was an Illinois corporation with its principle office located in the County of Winnebago, State of Illinois.
3. At all material times hereto MTP operated a Papa John's Pizza restaurant in South Beloit, Illinois.
4. At all material times hereto, PAPA JOHN'S INTERNATIONAL, INC. ("Papa John's") was a Kentucky corporation.

DOCKETED
JAN 28 2002

5. Upon information and belief, at all material times hereto, Defendant, KEVIN CAMPBELL ("Campbell") was an adult male resident of the County of Rock, State of Wisconsin.

6. At all material times hereto, MTP and Papa John's were employers as defined by 42 U.S.C. § 2000(e)(b).

7. Upon information and belief, at all material times hereto, Campbell was an employee of MTP and Papa John's.

8. Campbell was a General Manager in training at MTP's South Beloit Papa John's.

9. At all material times hereto, the General Manager of the South Beloit Papa John's was Donna Peterson.

10. Upon information and belief, on or about February 25, 2001, Marjorie Blood was hired by MTP and Papa John's to fill the position of group sales and events coordinator at the South Beloit Papa John's.

11. At all material times hereto, Marjorie Blood reported directly to the General Manager on duty at the South Beloit Papa John's.

12. At all material times hereto, the Area Supervisor for the South Beloit Papa John's was Jeff Srnec.

13. From February 25, 20001 through June 8, 2001, Marjorie Blood was subjected to a hostile work environment consisting of repeated and extreme sexual harassment by Campbell, including unwanted physical touching, sexually explicit language and threats, and sexual advances.

14. Upon information and belief, a co-worker, Crystal Blazer, was the first to advise management of the conduct of Campbell.

15. Thereafter, Marjorie Blood had a meeting with Donna Peterson and Jeff Srnec concerning the actions of Campbell.

16. Upon information and belief, Campbell was informed by management of Marjorie Blood's complaint concerning Campbell's behavior.

17. Thereafter, the harassment of Marjorie Blood by Campbell intensified and included unwanted physical touching, sexually explicit language and threats, and sexual advances.

18. After the harassment intensified, Marjorie Blood had further discussions with Jeff Srnec concerning the actions of Campbell and repeatedly requested that Jeff Srnec take action to stop the harassment by Campbell.

19. Jeff Srnec and Tom Baudhuin terminated Marjorie Blood on June 8, 2001, and Campbell was promoted to General Manager of the Janesville Papa John's.

20. Thereafter, Marjorie Blood timely filed a Charge of Employment Discrimination against MTP, Papa John's and Campbell with the District Office of the Equal Employment Opportunity Commission and the Illinois Department of Human Rights. A copy of Marjorie Blood's Charge of Employment Discrimination is attached hereto and marked as Exhibit "A."

21. Marjorie Blood received a "Notice of Right to Sue" relating to the previously filed Charge from the District Office of the Equal Employment Opportunity Commission on or after November 1, 2001, entitling her to institute a civil action with respect to the above-referenced conduct within 90 days of receipt of said Notice. A copy of said Notice is attached hereto and marked as Exhibit "B."

22. The claims in Counts I, II, and III arise under 42 U.S.C. § 2000(e), et. seq., as amended by the Civil Rights Act of 1991, and the claims in Counts IV, V, VI, VII, VIII, and IX arise

under Illinois state law. Federal question jurisdiction, 28 U.S.C. § 1331, exists as to Counts I, II, and III, and supplemental jurisdiction, 28 U.S.C. § 1337, exists as to Counts IV, V, VI, VII, VIII, and IX. This cause may be brought in this judicial district pursuant to 28 U.S.C. § 1331(b), as the alleged violations of Marjorie Blood's federal rights occurred in the Northern District of Illinois Western Division.

Count I - Sex Discrimination
Papa John's and MTP

1. - 22. Marjorie Blood repeats and realleges Paragraphs 1 through 22 of the Facts Common to All Counts as Paragraphs 1 through 22 of Count I of Plaintiff's Complaint.

23. At all times material hereto, Marjorie Blood was, and remains, qualified to perform her job with MTP and Papa John's, and performed the duties thereof in a manner consistent with their standards.

24. MTP and Papa John's, treated Marjorie Blood differently because of her sex, female.

25. Specifically, from the inception of her employment, Marjorie Blood was continuously discriminated against with respect to the terms, conditions and privileges of her employment, due to her sex, female in that she was subjected to unwanted physical touching, sexually explicit language and threats, and sexual advances.

26. Marjorie Blood reported the above conduct to management and was subsequently terminated.

27. Because of Defendants' actions, Marjorie Blood suffered a materially adverse change in the terms, conditions and privileges of her employment while Campbell received a promotion.

28. Marjorie Blood's status as a female was a motivating factor in the discrimination she endured and was a motivating factor in her discharge.

29. The conduct of MTP and Papa John's, by and through its agents, servants, and employees, with respect to Marjorie Blood, including but not limited to her discharge constitutes a willful violation of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000(e) et seq., as the employment decisions concerning Marjorie Blood were based upon Marjorie Blood's sex.

30. As a proximate result of the conduct, Marjorie Blood sustained damages, including but not limited to, mental and emotional distress, pain and suffering, humiliation and loss of wages (past and future).

WHEREFORE, Plaintiff, MARJORIEBLOOD, seeks compensatory and economic damages, damages for emotional pain and suffering, attorney's fees pursuant to 42 U.S.C. §2000(e) et seq., cost of suit, punitive damages, and all other proper damages against MTP and Papa John's, in a sum far in excess of \$75,000, together with such other relief as this court deems just and proper.

Count II - Sexual Harassment
Papa John's and MTP

1. - 22. Marjorie Blood repeats and realleges Paragraphs 1 through 22 of the Facts Common to All Counts as Paragraphs 1 through 22 of Count II of Plaintiff's Complaint.

23. Throughout her employment, Marjorie Blood was subjected to a hostile work environment, including, but not limited to, unwanted physical touching, sexual advances, sexually explicit language and threats from Campbell. Examples include the following: (a) Campbell did not allow Marjorie Blood out of a freezer for approximately 20 minutes while he pleaded with her to

have a relationship with him and initiated physical contact with her; (b) Campbell pinned Marjorie Blood against the corner of her desk so she was unable to move; and (c) Campbell threatened to co-workers that he would follow Marjorie Blood home, break into her home, and "hit it" with her (referring to sexual intercourse).

24. Marjorie Blood complained to management about the above harassment she endured and continued to endure.

25. On June 8, 2001, Marjorie Blood's employment was terminated.

26. One or more of the foregoing actions constitute sexual harassment in violation of 42 U.S.C. §2000(e) et seq.

27. The conduct of Campbell, MTP and Papa John's, was intentional and with deliberate indifference to the rights of Marjorie Blood, and altered Marjorie Blood's working conditions.

28. As a proximate result of the conduct, Marjorie Blood sustained damages, including, but not limited to, mental and emotional distress, pain and suffering, humiliation and loss of wages (past and future).

WHEREFORE, Plaintiff, MARJORIEBLOOD, seeks compensatory and economic damages, damages for emotional pain and suffering, attorney's fees pursuant to 42 U.S.C. §2000(e) et seq., cost of suit, punitive damages, and all other proper damages against MTP and Papa John's, in a sum far in excess of \$75,000, together with such other relief as this court deems just and proper.

Count III - Retaliation
Papa John's and MTP

1. - 22. Marjorie Blood repeats and realleges Paragraphs 1 through 22 of the Facts Common to All Counts as Paragraphs 1 through 22 of Count III of Plaintiff's Complaint.

23. Throughout her employment, Marjorie Blood was subjected to a hostile work environment, including, but not limited to, unwanted physical contact, sexual advances, sexually explicit and abusive language and threats from Campbell.

24. Marjorie Blood reported to management the above harassment she endured and continued to endure.

25. After reporting Campbell's conduct, Marjorie Blood was retaliated against when her employment was terminated. Despite knowledge of Campbell's actions, Campbell was promoted to General Manager of the Janesville Papa John's.

26. The conduct of Campbell, MTP and Papa John's was intentional and with deliberate indifference to the rights of Marjorie Blood and constitutes a willful violation of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000(e) et seq.

27. As a proximate result of this conduct, Marjorie Blood sustained damages, including, but not limited to, mental and emotional distress, pain and suffering, humiliation, and loss of wages (past and future).

WHEREFORE, Plaintiff, MARJORIE BLOOD, seeks compensatory and economic damages, damages for emotional pain and suffering, attorney's fees pursuant to 42 U.S.C. §2000(e) et seq., cost of suit, punitive damages, and all other proper damages against MTP and Papa John's, in a sum far in excess of \$75,000, together with such other relief as this court deems just and proper.

Count IV - Assault and Battery
Papa John's and MTP

1. - 19. Marjorie Blood repeats and realleges Paragraphs 1 through 19 of the Facts Common to All Counts as Paragraphs 1 through 19 of Count IV of Plaintiff's Complaint.

20. During the course of Marjorie Blood's employment at MTP, Campbell assaulted and battered Marjorie Blood in the following manner: (a) on or about March 14, 2001, Campbell did not allow Marjorie Blood to leave a walk-in freezer at the South Beloit Papa John's, he initiated physical contact with Marjorie Blood, and only let her leave when a co-worker opened the door; (b) Campbell pinned Marjorie Blood against the corner of her desk so that she was unable to move; and (c) Campbell threatened to co-workers that he would follow Marjorie Blood home, break into her home, and "hit it" with her (referring to sexual intercourse).

21. MTP and Papa John's, through their employee and agent, Campbell, who was acting within his authority, was guilty of assault and battery in one or more of the following respects: (a) intentionally and offensively initiating physical contact and prohibiting Marjorie Blood from leaving the freezer; (b) intentionally and offensively pinning Marjorie Blood at her desk so that she could not move; and (c) intentionally and offensively threatening to co-workers that he would follow Marjorie Blood home, break into her home, and "hit it" with her (referring to sexual intercourse).

22. As a proximate result of the conduct, Marjorie Blood suffered physical, mental and emotional injury, including mental anguish and humiliation.

23. The foregoing conduct was intentional and with utter disregard for Marjorie Blood's rights, health and well being that reaches the level of oppression, coercion and intimidation above

and contrary to the dictates of common decency, and therefore, the actions demonstrate malice and permit and entitle Marjorie Blood to punitive damages.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against MTP and Papa John's in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Count V - Assault and Battery
Campbell

1. - 20. Marjorie Blood repeats and realleges Paragraphs 1 through 20 of Count IV as Paragraphs 1 through 20 of Count V of Plaintiff's Complaint.

21. Campbell was guilty of assault and battery in one or more of the following respects: (a) intentionally and offensively initiating physical contact and prohibiting Marjorie Blood from leaving the freezer; (b) intentionally and offensively pinning Marjorie Blood at her desk so that she could not move; and (c) intentionally and offensively threatening to follow Marjorie Blood home and "hit it" with her (referring to sexual intercourse).

22. As a proximate result of the conduct, Marjorie Blood suffered physical, mental and emotional injury, including mental anguish and humiliation.

23. The foregoing conduct was intentional and with utter disregard for Marjorie Blood's rights, health and well being that reaches the level of oppression, coercion and intimidation above and contrary to the dictates of common decency, and therefore, the actions demonstrate malice and permit and entitle Marjorie Blood to punitive damages.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against Campbell, individually, in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Count VI - False Imprisonment
Papa John's and MTP

1. - 19. Marjorie Blood repeats and realleges Paragraphs 1 through 19 of the Facts Common to All Counts as Paragraphs 1 through 19 of Count VI of Plaintiff's Complaint.

20. On or about March 14, 2001, Campbell physically prevented Marjorie Blood from leaving a walk-in freezer for approximately 20 minutes while he pleaded with her to have a relationship with him and initiated physical contact with her.

21. MTP and Papa John's were then and there guilty of false imprisonment in that its employee and agent, Campbell, who was acting within his authority, unlawfully restrained and detained the movements of freedom of Marjorie Blood against her will.

22. As a proximate result of the conduct, Marjorie Blood suffered physical, mental and emotional injury, including fear for her life, mental anguish, and humiliation.

23. The foregoing conduct was intentional and with utter disregard for Marjorie Blood's rights, health and well being that reaches a level of oppression, coercion and intimidation above and contrary to the dictates of common decency, and therefore the actions demonstrate malice and permit and entitle Marjorie Blood to punitive damages.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against MTP and Papa John's, in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Count VII - False Imprisonment
Campbell

1. - 20. Marjorie Blood repeats and realleges Paragraphs 1 through 20 of Count VI as Paragraphs 1 through 20 of Count VII of Plaintiff's Complaint.

21. Campbell was then and there guilty of false imprisonment in that he unlawfully restrained and detained the movements of freedom of Marjorie Blood against her will.

22. As a proximate result of the conduct, Marjorie Blood suffered physical, mental and emotional injury, including fear for her life, mental anguish, and humiliation.

23. The conduct of Campbell was intentional and with utter disregard for Marjorie Blood's rights, health and well being that reaches the level of oppression, coercion and intimidation above and contrary to the dictates of common decency, and therefore the actions demonstrate malice and permit and entitle Marjorie Blood to punitive damages.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against Campbell, individually, in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Count VIII - Intentional Infliction of Emotional Distress
Papa John's and MTP

1. - 20. Marjorie Blood repeats and realleges Paragraphs 1 through 20 of Count IV as Paragraphs 1 through 20 of Count VIII of Plaintiff's Complaint.

21. MTP and Papa John's, by and through their employee and agent, Campbell, who was acting within his authority, knew that the actions identified above were an extreme violation of Marjorie Blood's rights, and that the actions would cause any reasonable person to fear for her life and that the actions would cause humiliation and embarrassment and cause emotional distress, intimidation and harassment.

22. As a proximate result of the conduct of MTP and Papa John's, by and through its employee and agent, Marjorie Blood suffered severe emotional distress, emotional pain and mental anguish including, but not limited to, nervousness, sleeplessness, depression and other physical injury for which she was required to seek counseling and cause her to incur economic hardship.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against MTP and Papa John's, in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Count IX - Intentional Infliction of Emotional Distress
Campbell

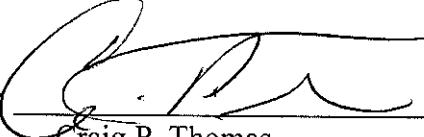
1. - 20. Marjorie Blood repeats and realleges Paragraphs 1 through 20 of Count VIII as Paragraphs 1 through 20 of Count IX of Plaintiff's Complaint.

23. Campbell knew that his actions were an extreme violation of Marjorie Blood's rights, and that the actions would cause any reasonable person to fear for her life and that said actions would cause humiliation and embarrassment and cause emotional distress, intimidation and harassment.

24. As a proximate result of the conduct, Marjorie Blood suffered severe emotional distress, emotional pain and mental anguish including, but not limited to, nervousness, sleeplessness, depression and other physical injury for which she was required to seek counseling and cause her to incur economic hardship.

WHEREFORE, Plaintiff, MARJORIE BLOOD, prays that the court enter judgment in favor of Marjorie Blood and against Campbell, individually, in an amount far in excess of \$75,000 plus cost of suit, together with such other and further relief as this Court deems just and proper.

Plaintiff, Marjorie Blood
By Reno, Zahm, Folgate, Lindberg & Powell,
Her Attorneys

By 
Craig P. Thomas

Reno, Zahm, Folgate, Lindberg
& Powell
By: Craig P. Thomas
1415 E. State Street, Suite 900
Rockford, IL 61104
(815) 987-4050

EXHIBIT A

10-30-2001 08:35

From: ILL DEPARTMENT OF HUMAN RIGHTS

312814825

T-605

P.014/017 F-710

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

AGENCY
 FEPA
 EEOCCHARGE NUMBER
2003CF05State of Illinois Department of Human Rights
State or local Agency, if anyNAME *Indicate Mr., Ms., Mrs.*
Marjorie BloodHOME TELEPHONE (Include Area Code)
608-362-5596STREET ADDRESS
2017 Forest StreetCITY, STATE AND ZIP CODE
Beloit, WI 53511DATE OF BIRTH
01-28-67NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY APPRENTICESHIP COMMITTEE
STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)NAME
MTP, Inc., d/b/a Papa John's PizzaNUMBER OF EMPLOYEES, MEMBERS
15+TELEPHONE (Include Area Code)
815-389-7272STREET ADDRESS
327 Blackhawk Blvd.CITY, STATE AND ZIP CODE
South Beloit, IL 61080COUNTY
WinnebagoNAME
Kevin CampbellTELEPHONE NUMBER (Include Area Code)
608-743-0745STREET ADDRESS
220 East Centerway StreetCITY, STATE AND ZIP CODE
Janesville, WI 53545COUNTY
Rock

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

DATE DISCRIMINATION TOOK PLACE
EARLIEST
LATEST

RACE COLOR SEX RELIGION NATIONAL ORIGIN
 RETALIATION AGE DISABILITY OTHER (Specify)
sexual harassment

June 8, 2001

THE PARTICULARS ARE (If additional space is needed, attach extra sheet(s)):

On or about February 25, 2001 Complainant was hired by MTP, Inc., d/b/a Papa Johns Pizza in the position of "Group Sales and Events". During the time that Complainant was employed at Respondent, Complainant was sexually harassed by Kevin Campbell resulting in Complainant being subjected to a hostile work environment.

The sexual harassment of Complainant by Kevin Campbell included but was not limited to making sexual slurs about Complainant, threatening to follow Complainant home and "hit it" with her (referring to sexual intercourse), unwanted physical contact which escalated to pinning Complainant in the corner of her desk so she was unable to move and not allowing Complainant out of a freezer for approximately 20 minutes.

The General Manager of the South Beloit Papa Johns, Donna Peterson, was advised of the sexual harassment. Donna Peterson reported the sexual harassment to the Area Supervisor, Jeff Sarnec. Subsequent to the complaints of sexual harassment made by Complainant, Complainant was terminated from her employment in retaliation for said complaints. Kevin Campbell was promoted and made General Manager of the Janesville, Wisconsin Papa Johns owned by MTP, Inc.

*HUMAN RIGHTS
SWITCHBOARD
AUG 13 2001-*

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and cooperate fully with them in the processing of my charge in accordance with fair procedures.

I declare under penalty of perjury that the foregoing is true and correct.

OFFICIAL SEAL

SUZANNE KIWAJKO

NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 06/14/06

NOTARIAL STAMP

Date

EEOC FORM 5 (Rev. 02/92)

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

DATE

8/3/01

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(Day, Month, and Year)

Suzanne Kiwaiko

FILE COPY

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

(Issued on request)

To: Marjorie Blood
2017 FOREST ST
BELOIT WI 53511

From:
EQUAL EMPLOYMENT OPPORTUNITY COMM.
Chicago District Office
500 W. Madison Street Suite 2800
Chicago, IL 60661-2511

On behalf of a person aggrieved whose identity is CONFIDENTIAL
(29 C.F.R. 1601.7(a))

Charge Number

EEOC Representative

Table N-4

(312) 886-5973

(See the additional information attached to this form)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964 and/or the Americans with Disabilities Act (ADA): This is your Notice of Right to Sue. It is issued under Title VII and/or the ADA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII or the ADA **must be filed in federal court WITHIN 90 DAYS of your receipt of this Notice.** Otherwise, your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

More than 180 days have passed since the filing of this charge.

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of the charge.

The EEOC is terminating its processing of this charge.

The EEOC will continue to process this charge.

Age Discrimination in Employment Act (ADEA): You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, the paragraph marked below applies to your case:

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal court WITHIN 90 DAYS of your receipt of this Notice.** Otherwise, your right to sue based on the above-numbered charge will be lost.

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the **filings** of your charge, you may file suit in federal or state court under the ADEA at this time.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required). EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit based on this charge, please send a copy of your court complaint to this office.

On Behalf of the Commission

John P. Rowe, District Director

(Date)

Enclosure(s)

cc: MTP INC DBA PAPA JOHNS PIZZA / KEVIN CAMPBELL
327 BLACKHAWK BLVD 220 EAST CENTERWAY STREET
SOUTH BELOIT, IL 61080 JANEVILLE, WISCONSIN 53545

02 C 50029

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Marjorie Blood

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Rock, WI
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

MTP, Incorporated, d/b/a Papa John's Pizza,
Papa John's International, Inc. and Kevin
Campbell

Winnebago, IL

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Craig P. Thomas and Jan H. Ohlander
Reno Zahm Law Firm
1415 E. State St., Ste. 900
Rockford, IL 61104

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

<input checked="" type="checkbox"/> Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	Transferred from <input type="checkbox"/> 5 another district (specify)
---	---	--	---	---

Appeal to District

Judge from

Magistrate
Judgment

V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> PERSONAL INJURY	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 425 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 435 Liquor Laws	<input type="checkbox"/> 450 Commerce/ICC Rates/etc.
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 440 R.R. & Truck	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 450 Airline Regs.	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 460 Occupational Safety/Health	<input type="checkbox"/> 510 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 470 Securities/Commodities/Exchange	<input type="checkbox"/> 550 Environmental Matters
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other	<input type="checkbox"/> 480 Customer Challenge 12 USC 3410	<input type="checkbox"/> 580 Agricultural Acts
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 410 Fair Labor Standards Act	<input type="checkbox"/> 490 Economic Stabilization Act	<input type="checkbox"/> 590 Energy Allocation Act
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 420 Labor/Mgmt. Relations	<input type="checkbox"/> 500 Freedom of Information Act	<input type="checkbox"/> 600 Appeal of Fee Determination Under Equal Access to Justice
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		<input type="checkbox"/> 650 HIA (1395ff)
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 662 Black Lung (923)	<input type="checkbox"/> 655 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input checked="" type="checkbox"/> 442 Employment	<input type="checkbox"/> HABEAS CORPUS:	<input type="checkbox"/> 663 DWIC/DIWW (405(g))	<input type="checkbox"/> 664 Energy Allocation Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 665 RSI (405(g))	<input type="checkbox"/> 665 Freedom of Information Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 700 Other Labor Litigation	<input type="checkbox"/> 690 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 446 Other Civil Rights	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 791 Emp. Ret. Inc. Security Act	<input type="checkbox"/> 695 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 696 Other Statutory Actions
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE.
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Sex discrimination and sexual harassment pursuant to 42 U.S.C. § 2000(e), et. seq.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
 UNDER F.R.C.P. 23

DEMAND \$

In excess of \$75,000

CHECK YES only if demanded in complaint:

JURY DEMAND: YES NOVIII. RELATED CASE(S) (See instructions):
IF ANY

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

1/25/02
FOR OFFICE USE ONLYDOCKETED
JAN 28 2002

UNITED STATES DISTRICT COURT **FILED-WD**
NORTHERN DISTRICT OF ILLINOIS

2002 JAN 25 PM 3:45

In the Matter of

Marjorie Blood

vs.

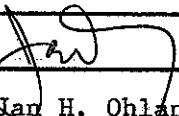
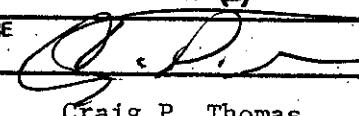
MTP, Incorporated, d/b/a Papa John's Pizza,
Papa John's International, Inc. and Kevin Campbell

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Marjorie Blood

CLERK
U. S. DISTRICT COURT
02C50029

Case Number:

(A)		(B)			
SIGNATURE 		SIGNATURE 			
NAME	NAME				
Jan H. Ohlander	Craig P. Thomas				
FIRM	FIRM				
Reno Zahm Law Firm	Reno Zahm Law Firm				
STREET ADDRESS	STREET ADDRESS				
1415 E. State St., Ste. 900	1415 E. State St., Ste. 900				
CITY/STATE/ZIP	CITY/STATE/ZIP				
Rockford, IL 61104	Rockford, IL 61104				
TELEPHONE NUMBER	TELEPHONE NUMBER				
(815) 987-4050	(815) 987-4050				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)				
03124934	06202015				
MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
			DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		
(C)		(D)			
SIGNATURE		SIGNATURE			
NAME	NAME				
FIRM	FIRM				
STREET ADDRESS	STREET ADDRESS				
CITY/STATE/ZIP	CITY/STATE/ZIP				
TELEPHONE NUMBER	TELEPHONE NUMBER				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)				
MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
TRIAL ATTORNEY?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/>	NO <input type="checkbox"/>

DOCKETED
JAN 28 2002